

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL C. MAYO,)	
Plaintiff,)	
v.)	
)	
LARRY GAVIN, KAREN JONES-)	Case No.: 1:21-cv-04653
HAYES, DAMITA DELITZ, BRENDON)	
LOMBARDI, DIRECTOR MILLER,)	Hon. Judge John J. Tharp, Jr.
OFFICER BUCHANAN, THOMAS)	
DART AND LIEUTENANT DOUGE)	
Defendants.)	
)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO COMPLETE
ESI**

NOW COME Defendants, LARRY GAVIN, DAMITA DELITZ, BRENDON LOMBARDI, DIRECTOR MILLER, OFFICER BUCHANAN, THOMAS DART AND LIEUTENANT DOUGE (collectively "Defendants"), by and through their attorneys Jason E. DeVore and Troy S. Radunsky of DeVore Radunsky LLC, and for their motion for extension of time to complete ESI Discovery, states as follows:

1. This motion is unopposed.
2. The Court ordered that ESI discovery should be completed by March 10, 2023. Dckt. No. 95.
3. Defendants' counsel recently obtained over 48,000 pages of records following Plaintiff's ESI requests, which need to be carefully reviewed for potential attorney-client privilege and so Defendants can create the required privilege log under Rule 26(b)(5).
4. Defendants have advised Plaintiff of their concerns about meeting the Court's March 10, 2023, deadline to complete ESI given the voluminous materials and need for creation of a detailed and thorough privilege log.

5. Defendants anticipate completing the above steps and completing production of ESI Discovery on or before March 24, 2023.

6. Under the Federal Rules of Civil Procedure, this “court may, for good cause, extend the time . . . with motion . . . or if a request is made, before the original time or its extension expires” Fed. R. Civ. P. 6(b)(1)(A).

7. The Defendants therefore request an extension until March 24, 2023, to complete ESI Discovery.

8. This motion is brought in good faith and not for delay or any improper purpose.

WHEREFORE, the parties respectfully request that this Honorable Court enter the following order:

1. Granting the Unopposed Motion for Extension of Time to Complete ESI Discovery;
2. The Parties are allowed until March 24 2023, to complete ESI Discovery.
3. For any other relief this Court deems just and proper.

Respectfully Submitted,

**TOM DART, COOK COUNTY
SHERIFF’S OFFICE, AND COOK
COUNTY**

By: /s/ Jason E. DeVore
Jason E. DeVore, One of the Attorneys
for Defendant

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that Defendant's Motion for Extension of Time was filed on March 9, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/ Zachary Stillman
Zachary Stillman